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Attorneys for *Defendants* **MOISHE GUBIN, OPTIMUMBANK HOLDINGS, INC.,
OPTIMUMBANK, and OPTIMUMBANK.COM**

UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA – SANTA ANA DIVISION

In re:

THE LITIGATION PRACTICE GROUP, P.C.,

Debtor.

Case No.: 8:23-bk-10571-SC
Chapter 11
Adv. Case No.: 8:25-ap-01105-SC

RICHARD A. MARSHACK, Trustee of the LPG
Liquidation Trust,

Plaintiff,

v.

WORLD GLOBAL FUND, LLC, *et al.*,

Defendants.

**STIPULATION TO FURTHER EXTEND
DEADLINE FOR DEFENDANTS MOISHE
GUBIN, OPTIMUMBANK HOLDINGS,
INC., OPTIMUMBANK, AND
OPTIMUMBANK.COM TO RESPOND TO
COMPLAINT**

Hearing: [No Hearing Required]

This *Stipulation to Further Extend Deadline for Defendants to Respond to Complaint* (the “Stipulation”) is entered into by and between *plaintiff* Richard A. Marshack, Trustee of the LPG Liquidation Trust (“Plaintiff”), and *defendants* Moishe Gubin, OptimumBank Holdings, Inc., OptimumBank, and OptimumBank.com (collectively, the “Defendants”), by and through their undersigned counsel.

RECITALS

A. On March 10, 2025, Plaintiff initiated this action by filing a complaint (the “Complaint”) against Defendants, among others. (*See* Doc. 1).

CASE NO. 8:25-ap-01105-SC

STIPULATION TO FURTHER EXTEND DEADLINE FOR DEFENDANTS TO RESPOND TO COMPLAINT

1 B. On April 16, 2025, Defendants and the Trustee entered into a Stipulation to Extend
2 Deadline for Defendants to Respond to Complaint (the "Prior Stipulation") wherein the Trustee agreed
3 to extend Defendants' response deadline to April 28, 2025. (See Doc. 37). The Court entered an order
4 approving the Prior Stipulation on April 17, 2025. (See Doc. 38).

5 C. Given the length and complexity of the Complaint, Defendants requested – and the
6 Trustee agreed to – a further extension of Defendants' deadline to respond to the Complaint, the terms
7 of which are memorialized in this Stipulation. Defendants have agreed to participate in a Rule 26(f)
8 conference with the Trustee's counsel on May 1, 2025, notwithstanding the further extension of their
9 response deadline.

10 **TERMS**


11 The Parties stipulate and agree as follows:

12 1. The deadline for Defendants to respond to the Complaint shall be extended to May 12,
13 2025.

14 **IT IS SO STIPULATED.**


15
16 Dated: April 29, 2025

DINSMORE & SHOHL LLP

17 
18 MATTHEW SOMMER
19 Attorneys for Plaintiff **RICHARD A. MARSHACK,**
20 **TRUSTEE OF THE LPG LIQUIDATION TRUST**

21 Dated: April 29, 2025

HINSHAW & CULBERTSON LLP

22 
23 BRIAN A. PAINO
24 Attorneys for Defendants **MOISHE GUBIN,**
25 **OPTIMUMBANK HOLDINGS, INC.,**
26 **OPTIMUMBANK, and OPTIMUMBANK.COM**

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:

HINSHAW & CULBERTSON, LLP 350 S. Grand Avenue, Suite 3600, Los Angeles, CA 90071-3476

A true and correct copy of the foregoing document entitled (*specify*): **STIPULATION TO FURTHER EXTEND DEADLINE FOR DEFENDANTS MOISHE GUBIN, OPTIMUMBANK HOLDINGS, INC., OPTIMUMBANK, AND OPTIMUMBANK.COM TO RESPOND TO COMPLAINT**

will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (*date*) 04/29/2025, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

- **Christopher Ghio** Christopher.Ghio@dinsmore.com; angelica.urena@dinsmore.com
- **Karen Hockstad** karen.hockstad@dinsmore.com; kim.beavin@dinsmore.com
- **Ira David Kharasch** ikharasch@pszjlaw.com
- **Michael Lundholm** mlundholm@londonstoutlaw.com
- **Richard A Marshack (TR)** pkraus@marshackhays.com; ecf.alert+Marshack@titlexi.com
- **Victoria Newmark** vnewmark@pszjlaw.com; hdaniels@pszjlaw.com; bdassa@pszjlaw.com; hwinograd@pszjlaw.com
- **Brian A Paino** bpaino@hinshawlaw.com; hmosothoane@hinshawlaw.com; crico@hishawlaw.com
- **Matthew Sommer** matthew.sommer@dinsmore.com; carrie.davis@dinsmore.com
- **United States Trustee (SA)** ustpreion16.sa.ecf@usdoj.gov

☐ Service information continued on attached page

2. SERVED BY UNITED STATES MAIL:

On (*date*) _____, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (date) _____, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

04/29/2025

Date

Carolina Rico

Printed Name

/s/ Carolina Rico

Signature

This form is mandatory. It has been approved for use by the United States Bankruptcy Court for the Central District of California.